

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

THE M/Y *AMADEA*, A MOTOR YACHT
BEARING INTERNATIONAL MARITIME
ORGANIZATION NO. 1012531,
INCLUDING ALL FIXTURES, FITTINGS,
MANUALS, STOCKS, STORES,
INVENTORIES, AND EACH LIFEBOAT,
TENDER, AND OTHER
APPURTENANCE THERETO,

Defendant-*In-Rem*,

and

EDUARD YURIEVICH KHUDAINATOV,
MILLEMARIN INVESTMENTS LTD.,

Claimants.

Case No. 1:23-cv-09304

The Honorable Dale E. Ho

ORAL ARGUMENT REQUESTED

**NOTICE OF MOTION FOR
RECONSIDERATION OR
CERTIFICATION UNDER
28 U.S.C. § 1292(b)**

PLEASE TAKE NOTICE that upon the memorandum in support of this motion, Claimants Eduard Yurievich Khudainatov and Millemarin Investments Ltd. hereby move this Court, before the Honorable Dale E. Ho, United States District Court for the Southern District of New York, 40 Foley Square, New York, New York, 10007, for reconsideration or certification under 28 U.S.C. § 1292(b).

Dated: March 7, 2024

Respectfully submitted,

FORD O'BRIEN LANDY LLP

By: /s/ Adam C. Ford
Adam C. Ford
Renée L. Jarusinsky
275 Madison Avenue, 24th Floor
New York, NY 10016
Tel.: (212) 858-0040 (main)
aford@fordobrien.com
rjarusinsky@fordobrien.com

*Attorneys for Claimants Eduard Yurievich
Khudainatov and Millemarin Investments Ltd.*